Mr. Dennis W. Knigga
Batesville Manufacturing, Inc.
1000 East Pearl Street
Batesville, Indiana 47006

Re: Part 70 Minor Source Modification
137-14731-000161

Dear Mr. Knigga:

Batesville Manufacturing, Inc. applied for a Part 70 operating permit on November 25, 1996 for a burial caskets manufacturing operation. A letter requesting changes to this permit was received on August 10, 2001. Pursuant to the provisions of 326 IAC 2-7-10.5 a minor source modification to this permit is hereby approved as described in the attached Technical Support Document. The following emission unit is approved to be revised:

(a) One (1) electrostatic metal casket spray booth, identified as B-14-40, constructed in 1981, capable of processing 50 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 14-EF-40.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(d).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Pan, at (973) 575-2555, ext. 3248, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SCP/EVP

cc: File - Ripley County
U.S. EPA, Region V
Ripley County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 MINOR SOURCE MODIFICATION
OFFICE OF AIR QUALITY

Batesville Manufacturing, Inc.
1000 East Pearl Street
Batesville, Indiana 47006

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.: 137-14731-00016	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 9, 2001

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary burial casket manufacturing operation.

Responsible Official:	**Dennis W. Knigga**
Source Address:	**1000 East Pearl Street, Batesville, Indiana 47006**
Mailing Address:	**1000 East Pearl Street, Batesville, Indiana 47006**
General Source Phone Number:	**(812) 934-7341**
SIC Code:	**3995**
County Location:	**Ripley**
Source Location Status:	**Attainment for all criteria pollutants**
Source Status:	**Part 70 Permit Program** **Major Source, under PSD Rules;** **Major Source, under Section 112 of the Clean Air Act**

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This burial casket manufacturing source is approved to operate the following emission units and pollution control devices:

(a) One (1) electrostatic metal casket spray booth, identified as B-14-40, constructed in 1981, capable of processing 50 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 14-EF-40.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This modification to a stationary burial casket manufacturing source does not include any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary burial casket manufacturing source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Minor Source Modification [326 IAC 2-7-10.5(d)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(d).

In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

(a) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Minor Source Modification will be included in the Part 70 draft.

(b) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Minor Source Modification, the Minor Source Modification will be incorporated into the final Part 70 permit at the time of issuance.

(c) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Minor Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.10 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) electrostatic metal casket spray booth, identified as B-14-40, constructed in 1981, capable of processing 50 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 14-EF-40.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [3236 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), the VOC usage in the metal casket spray booth B-14-40 shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 do not apply. Compliance with this VOC usage limit shall also make the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the metal casket spray booth B-14-40 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3), 326 IAC 8-1-4(a)(4) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC Emissions

Compliance with Condition D1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

The waterwash for PM control shall be in operation at all times when the the metal casket spray booth B-14-40 is in operation.

D.1.7 Operator Training

(a) The waterwash system for particulate matter overspray control shall be properly maintained to ensure integrity and particle loading of the waterwash system at all times when the metal casket spray booth is in operation.

(b) Batesville Manufacturing shall implement an operator-training program.

(1) All operators that perform spray booth operation or maintenance must be trained in the proper set-up and operation of the particulate control system before the assignment.

(2) Training shall include proper waterwash coverage, water release equipment inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or those items necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage each month for the metal casket spray booth B-14-40 ;

(4) The total VOC usage each month for the metal casket spray booth B-14-40; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.7(b)(1) through (b)(3), the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Batesville Manufacturing, Inc.
Source Address: 1000 East Pearl Street, Batesville, IN 47006
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006
Source Modification No.: T137-14731-00016

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Source Modification Quarterly Report

Source Name: Batesville Manufacturing, Inc.
Source Address: 1000 East Pearl Street, Batesville, IN 47006
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006
Source Modification No.: T137-14731-00016
Facility: Metal Casket Spray Booth B-14-40
Parameter: VOC Usage
Limit: Less than 25 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Batesville Manufacturing, Inc.
Source Location:	1000 East Pearl Street, Batesville, Indiana 47006
County:	Ripley
SIC Code:	3995
Operation Permit No.:	T137-7280-00016
Source Modification No.:	MSM 137-14731-00016
Permit Reviewer:	Scott Pan/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Batesville Manufacturing, Inc. relating to the operation of the modification to a burial caskets manufacturing plant.

History

On August 10, 2001, Batesville Manufacturing, Inc. submitted an application to the OAQ requesting to increase the maximum throughput for one (1) electrostatic metal casket brushed clearcoat spray booth which exhausts through Stack 14-EF-40 from 28 caskets per hour to 50 caskets per hour. Batesville Manufacturing, Inc. applied for a Part 70 Operating Permit (T137-7280-00016) on November 25, 1996.

Source Definition

This metal caskets manufacturing source consists of three (3) plants:

(1) Plant #1 (Assembly Plant) is located at 1000 East Pearl Street, Batesville, Indiana 47006.

(2) Plant #2 (Options Plant) is located at 705 East Pearl Street, Batesville, Indiana 47006.

(3) Plant #3 (Stamping Plant) is located at 100 Eastern Avenue, Batesville, Indiana 47006.

Plants #2 and #3 are located on contiguous properties and Plant #1 is located nearby (within 0.5 miles distance). The three (3) plants are owned and operated by one (1) company, have the same SIC codes, and more than 50% of the products in Plant #2 are shipped to Plant #1. Therefore, the three (3) plants are considered as one (1) source.

Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the operation of the following equipment pursuant to 326 IAC 2-7-5(16):

(a) One (1) electrostatic metal casket spray booth, identified as B-14-40, constructed in 1981, capable of processing 50 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 14-EF-40.

Existing Approvals

The source applied for a Part 70 Operating Permit (T137-7280-00016) on November 25, 1996. The source has since received the following:

(a) Construction Permit No. 137-10452-00016, issued on April 29, 1999.

(b) Minor Source Modification No. 137-12307-00016, issued on November 6, 2000.

(c) No. 137-12938-00016, issued on December 11, 2000, for the revocation of Minor Source Modification No. 137-12307-00016.

(c) Administrative Amendment No. 137-14448-00016, issued on July 18, 2001.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification, be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 10, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (2 pages).

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	13.46
PM-10	13.46
SO_2	0.0
VOC	37.92
CO	0.0
NO_x	0.0

HAP's	Potential To Emit (tons/year)
Xylene	Less than 10
Ethylbenzene	Less than 10
Formaldehyde	Less than 10
Phenol	Less than 10
Cumene	Less than 10
Toluene	Less than 10
MIBK	Less than 10
MEK	Less than 10
TOTAL	Less than 25

Justification for Modification

The source shall limit VOC emissions to less than 25 tons per year, through limiting solvent usages. Therefore, pursuant to 326 IAC 2-7-10.5(d), the Title V source is being modified through a Minor Source Modification.

County Attainment Status

The source is located in Ripley County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Ripley County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	19.74
PM10	19.74
SO_2	0.00
VOC	1,688.89
CO	0.00
NO_x	0.00
Single HAP	334.42
Total HAP	896.27

(a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.

(b) These emissions were based on the Part 70 application submitted by the company.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
B-14-40 Spray Booth								
Future Potential	1.35	1.35	0.00	< 25 (a)	0.00	0.00	9.91	13.15
Present Actual (b)	0.41	0.41	0.00	8.50	0.00	0.00	2.22	2.95
Differences (c)	0.94	0.94	0.00	<16.50	0.00	0.00	7.69	11.20
PSD or Offset Significant Level	25	15	40	40	100	40	N/A	N/A

(a) The facility will have a potential VOC emissions of 37.9 tons per year after modification. However, the input VOC shall be limited to less than 25 tons/year, such that the BACT requirements of 326 IAC 8-1-6 do not apply.

(b) Present actual emissions were determined based on the average of actual material usages for metal casket spray booth during 1999 and 2000.

(c) This modification to an existing major stationary source is not major because the differences in emissions due to the modification are less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this modification.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The existing source is a major PSD source. Therefore, any modification to this source which results in the net potential to emit change (after considering contemporaneous increases and decreases) of any of the criteria pollutants greater than the major modification thresholds, would be subject to the requirements of 326 IAC 2-2. The change of electrostatic metal casket spray booth coating rate does not trigger PSD applicability. Therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

326 IAC 2-4.1-1 applies to new or reconstructed facilities after July, 1997 with potential emissions of any single HAP equal or greater than ten (10) tons per twelve (12) month period and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per twelve (12) month period. Since the electrostatic metal casket spray booth is an existing facility constructed prior to July, 1997 and has the potential to emit any single HAP and any combination of HAPs less than 10 tons and 25 tons per consecutive twelve (12) month period, respectively, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the electrostatic metal casket spray booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The waterwash shall be in operation at all times the inner panel spray booth is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Facilities existing as of January 1, 1980 having potential VOC emissions of 25 tons per year or more, and that are not subject to any other 8 rules, shall reduce VOC emissions using Best Available Control Technology (BACT). The metal casket spray booth was constructed in 1981 and had a potential VOC emissions of 21.2 tons per year based on a maximum coating rate of 28 units per hour as previously permitted. However, the metal casket spray booth will have a potential VOC emissions of 37.9 tons per year after increasing the maximum coating rate to 50 units per hour. Since this change will make the booth a “new” facility with potential VOC emissions greater than 25 tons per year, it will be potentially subject to 326 IAC 8-1-6. The facility shall limit the VOC usage at the electrostatic metal casket spray booth to less than 25 tons per twelve (12) month period. Therefore, the electrostatic metal casket spray booth, after increasing the maximum coating rate to 50 units per hour, is not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operation)

The electrostatic metal casket spray booth is not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operation). Pursuant to 326 IAC 8-2-9(a), the application of coatings to burial caskets is not subject to the requirements of 326 IAC 8-2-9.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

The metal casket spray booth has applicable compliance monitoring conditions as specified below:

(a) The waterwash system for particulate matter overspray control shall be properly maintained to ensure integrity and particle loading of the waterwash system at all times when the metal casket spray booth is in operation.

(b) Batesville Manufacturing shall implement an operator-training program.

(1) All operators that perform spray booth operation or maintenance must be trained in the proper set-up and operation of the particulate control system before the assignment.

(2) Training shall include proper waterwash coverage, water release equipment inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the waterwash system for the metal casket spray booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this metal casket spray booth shall be subject to the conditions of the attached proposed **Minor Source Modification No. 137-14731-00016**.

Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Batesville Casket Company
Address City IN Zip: 1000 East Pearl Street, Batesville, Indiana 47006
Permit #: 137-14731
Plt ID: 137-00016
Reviewer: Scott Pan/EVP
Date: Sept. 10, 2001

State Potential Emissions (uncontrolled):

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Assembly Plant																	
Brush Topcoat Mix	Surface Coating	8.54	45.59%	0.00%	45.59%	0.00%	42.30%	0.0441	50.00	3.9	3.89	8.58	206.04	37.60	13.46	13.15	70.00%
Solvent	Clean-up	7.01	100.00%	0.00%	100.00%	0.00%	0.00%	0.0002	50.00	7.0	7.01	0.07	1.77	0.32	0.00		100.00%
Total Potential Emissions:												**8.66**	**207.80**	**37.92**	**13.46**		

	Control Efficiency: VOC **	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year **	Controlled PM tons/yr
Total Limited/Controlled Emissions:	34.11%	90.00%	**5.71**	**136.93**	**24.99**	**1.35**

**** VOC usage for the Brush Unit is limited to less than 25 tons per 12 consecutive month period, therefore the requirements 326 IAC 8-1-6 do not apply.**

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Total = Sum of all coatings and solvents used
Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Batesville Casket Company
Address City IN Zip: 1000 East Pearl Street, Batesville, Indiana 47006
Permit #: 137-14731
Plt ID: 137-00016
Reviewer: Scott Pan/EVP
Date: Sept. 10, 2001

Material	Density (Lb/Gal)	Maximum Usage (Gal/yr)		Xylene	Ethyl-benzene	Formalde-hyde	Phenol	Toluene	Cumene	MIBK	MEK	Total (ton/yr)
Brush Topcoat Mix	8.54	19316	Wt. %	12.02%	2.00%	0.42%	0.83%	0.00%	0.31%	0.00%	0.00%	
			Emissions (ton/yr)	9.91	1.65	0.35	0.68	0.00	0.26	0.00	0.00	12.85
Solvent	7.01	92	Wt. %	0.00%	0.00%	0.00%	0.00%	56.00%	0.00%	19.00%	19.00%	
			Emissions (ton/yr)	0.00	0.00	0.00	0.00	0.18	0.00	0.06	0.06	0.30
Total Potential Emissions				**9.91**	**1.65**	**0.35**	**0.68**	**0.18**	**0.26**	**0.06**	**0.06**	**13.15**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 1 ton/2000 lbs